

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

THOMAS RICHARDS

Case No. 3:25-cv-1863

Plaintiff,

v.

LINDA YACCARINO,

Defendant

Lisa Weingarten Richards, Esq.

VSB #96671

NY BAR #4932570

LWR Law Offices

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Counsel for plaintiff

**ERRATA TO AMENDED COMPLAINT AND MOTION FOR TEMPORARY
RESTRAINING ORDER**

**CORRECTION REGARDING TECHNOLOGY TRANSFORMATION SERVICES
STAFFING**

Counsel submits this errata to correct a factual misstatement in both the Amended Complaint and Second Renewed Motion for Temporary Restraining Order.

Counsel submits this supplement to correct a factual misstatement in both the Complaint and Motion for Temporary Restraining Order.

Counsel stated that the Technology Transformation Services (TTS) unit "includes around 700 engineering professionals picked by Musk," citing a February 4, 2025 Teslarati article. Upon further review, this was inaccurate.

The underlying New York Times source (February 3, 2025, "Musk Allies Discuss Deploying A.I. to Find Budget Savings"<https://www.nytimes.com/2025/02/03/technology/musk-allies-ai-government.html>) states that GSA "houses the Technology Transformation Services, a group of roughly 700 technologists that Mr. Musk's DOGE has seen as a key resource of engineering talent."

The correct facts are: TTS is a pre-existing government unit of approximately 700 technologists. Musk has gained operational control over this unit by placing Thomas Shedd, a former Tesla engineer, as its director, and embedding more than three dozen DOGE-affiliated individuals at GSA, including Musk-connected personnel such as Luke Farritor (former SpaceX intern), Edward Coristine (former Neuralink intern), and Ethan Shaoiran, who have been converted to full-time federal employees within the unit. Musk did not personally select all 700 technologists but rather strategically placed dozens of his allies to control the existing workforce.

This correction does not affect Plaintiff's core allegations regarding DOGE's systematic placement of Musk-connected personnel in positions of control over federal technology operations, only the number of individuals that were specifically picked by Musk.

Respectfully submitted,

/s/ Lisa Weingarten Richards

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